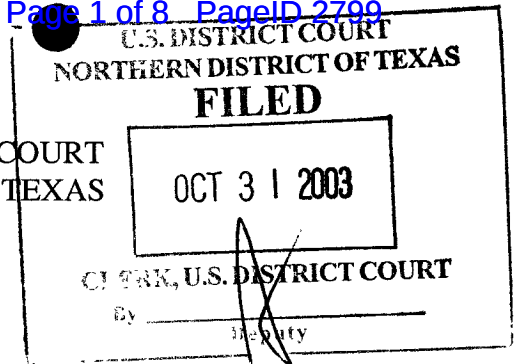


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



ALLSTATE INSURANCE COMPANY,
et al.,

Plaintiffs,

VS.

RECEIVABLE FINANCE COMPANY,
L.L.C., et al.,

Defendants.

§
§
§
§
§
§
§

CIVIL ACTION NO. 3-01-CV2247-N

**APPENDIX TO DEFENDANT MOHAMMAD BORGHEE'S RESPONSE
TO PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND
AMENDED COMPLAINT AND BRIEF IN SUPPORT THEREOF**

MOHAMMAD BORGHEE, one of the Defendants in the above-styled and numbered cause, submits this Appendix to Defendant Mohammad Borghee's Response to Plaintiffs' Motion for Leave to File Second Amended Complaint and Brief in Support Thereof.

<u>Exhibit</u>	<u>Document</u>	<u>Page Numbers</u>
A	Excerpts from NICB Log of Documents	1
B	Print-Outs from Texas Comptroller web site regarding Pharmed Clinic Corporation and its officers and directors	2- 5
C	Print-Out from Texas State Board of Pharmacy web site regarding Family Care Pharmacy #5	6

Respectfully submitted,

Robert H. Renneker
Texas Bar No. 16778800

1412 Main Street
Suite 210
Dallas, Texas 75202
(214) 742-7100
(214) 742-7110 (telecopier)

ATTORNEY FOR DEFENDANT
MOHAMMAD BORGHEE

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Appendix to Defendant Mohammad Borghee's Response to Plaintiffs' Motion for Leave to File Second Amended Complaint was served on the attorney for the Plaintiff, Mr. David Kassabian, Kassabian, Doyle & Weatherford, P.C., 1521 North Cooper Street, Suite 650, LB 21, Arlington, Texas 76011 by telecopy and by depositing same in the United States Mail, postage prepaid thereon, and on each of the attorneys listed below by electronic transmission, on this the 31st day of October, 2003:

Mr. Lindy Jones
Jones, Allen & Fuquay, L.L.P.
8828 Greenville Avenue
Dallas, Texas 75243-7143

Charles Wade Arnold
Canty & Hanger, L.L.P.
801 Cherry Street, Suite 2100
Fort Worth, Texas 76102-6881

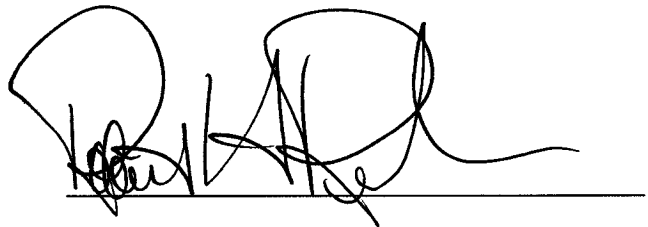
Mr. Michael E. Mears
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1717 Main Street, Suite 3700
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Plano, Texas 75093

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Dallas, Texas 75374-0033

Mr. Rick K. Disney
Douglas, Wuester & Disney, P.C.
777 Taylor Street, Penthouse I-C
Fort Worth, Texas 76102-4919

A handwritten signature in black ink, appearing to read 'Mohammad Borghee', is written over a horizontal line.

Key to Objections:							
1) Attorney/client privilege and/or common interest privilege							
2) Attorney work product							
3) Texas Insurance Code/common-law law enforcement privilege							
4) Trade secret/proprietary research methods							
5) Public Policy - interference with detection and eradication of insurance fraud							
Bates-Range	Type of Document	Date	From	To	CC	General Description of Document	Objection/ Privilege Asserted
NICB 02916	File Folder	Undated				Folder containing documents NICB 02917 - NICB 02940	2,3,4,5
NICB 02917 - NICB 02918	Research	Undated	Lexis			Texas Secretary of State Corporate Record re Metroplex Pain Center, Inc.	2,3,4,5
NICB 02919 - NICB 02940	Research	05/24/2001	Texas Comptroller			Texas Comptroller of Public Accounts Corporate information re Metroplex Pain Center Inc	2,3,4,5
NICB 02941	File Folder	Undated				Folder containing documents NICB 02942 - NICB 2963	2,3,4,5
NICB 02942 - NICB 02963	Research	05/24/2001	Texas Comptroller			Texas Comptroller of Public Accounts Corporate information re North Texas Open Air MRI LLC	2,3,4,5
NICB 02964	File Folder	Undated				Folder containing documents NICB 02965 - NICB 02968	2,3,4,5
NICB 02965 - NICB 02968	Research	05/30/2001	Texas Comptroller			Texas Comptroller of Public Accounts Corporate Information re Professional Medical Consultants PLLC	2,3,4,5
NICB 02969	File Folder	Undated				Folder containing documents NICB 02970 - NICB 02981	2,3,4,5
NICB 02970 - NICB 02978	Research	05/01/2001	Texas Comptroller			Texas Comptroller of Public Accounts Corporate information re Pharmed Clinical Corporation	2,3,4,5
NICB 02979 - NICB 02981	Research	05/01/2001	Texas State Board of Pharmacy			Texas State Board of Pharmacy information re Family Care Pharmacy #5	2,3,4,5
NICB 02982	File Folder	Undated				Folder containing documents NICB 02983 - NICB 02996	2,3,4,5
NICB 02983 - NICB 02996	Research	05/23/2001	Texas Comptroller			Texas Comptroller of Public Accounts Corporate Information re Receivable Finance Co LLC	2,3,4,5
NICB 02997	File Folder	Undated				Folder containing documents NICB 02998 - NICB 02999	2,3,4,5



WINDOW ON STATE GOVERNMENT

CAROLE KEETON STRAYHORN Texas Comptroller of Public Accounts



Texas Taxes

Certification of Account Status

Detailed Instructions

Franchise Tax Certification of Account Status

Return to: Corporation Search Results

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Certificates for filing with the Secretary of State to dissolve, merge, withdraw, or convert are not available through this Web site at this time.

For more information see Publication 98-336, Requirements to Change Corporate Status.

Certificate of Account Status

Officers And Directors Information

Company Information:

**PHARMED CLINIC
CORPORATION
4436 W WALNUT ST
GARLAND, TX 75042-5916**

Status:

**IN GOOD STANDING NOT
FOR DISSOLUTION OR
WITHDRAWAL through May
17, 2004**

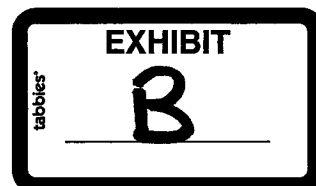
Registered Agent:

**HOSSAIN KHAKPOUR
4436 W. WALNUT
GARLAND, TX 75042**

Registered Agent
Resignation Date:

State of Incorporation:

TX



2

File Number: 0130443300
Charter/COA Date: March 8, 1994
Charter/COA Type: Charter
Taxpayer Number: 17525298562

Carole Keeton Strayhorn
Texas Comptroller of Public Accounts

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3

WINDOW ON STATE GOVERNMENTCAROLE KEETON STRAYHORNTexas Comptroller of Public Accounts

Texas Taxes

Certification of Account Status

Detailed Instructions

Officers and Directors PHARMED CLINIC CORPORATION

Return to: Corporation Search ResultsReturn to: Corporation Search

Officer and director information on this site is obtained from the most recent Public Information Report (PIR) processed by the Secretary of State (SOS). PIRs filed with annual franchise tax reports are forwarded to the SOS. After processing, the SOS sends the Comptroller an electronic copy of the information, which is displayed on this web site. The information will be updated as changes are received from the SOS.

You may order a copy of a Public Information Report from open.records@cpa.state.tx.us or Comptroller of Public Accounts, Open Government Division, PO Box 13528, Austin, Texas 78711.

Title:	Name and Address:	Expiration/Resignation Date:
<i>DIRECTOR</i>	HOSSAIN KHAKPOUR 4540 PEBBLE BROOK LANE PLANO, TX 75093	
<i>DIRECTOR</i>	SAEID DAVANI 5112 MARBLE FALLS LANE PLANO, TX 75093	

(4)

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www.TSBP.state.tx.us

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Pharmacy Database - Detailed View - License # 18706

[Search Options](#) > [New Search](#) > [Detailed View](#)

[Search Help](#) | [Status Codes](#) | [Terms of Use](#)

Family Care Pharmacy #5

Current Status Active
License # 18706
Expiration Date 11/30/2004
Date License Issued 11/04/1997

[Click here for Employment Information for each person employed at this Pharm.](#)



[Click here to see a map.](#)

Address

9709 Bruton Road Ste 1
Dallas, TX 75217-0

County DALLAS

Phone (972) 329-3868

[If map is incorrect, try this alternate map.](#)

* Information relating to disciplinary order is current as of (30 days prior to this date)

Pharmacy Details

* **Prior Disciplinary Orders** No
Class of Pharmacy Community
Type of Ownership Corporation
Type of Pharmacy Community (Independent)

A written request for information regarding disciplinary orders may be submitted to the office Texas State Board of Pharmacy. Disciplinary orders entered pursuant to Chapter 564 of the Texas Pharmacy Act are confidential and not subject to disclosure.

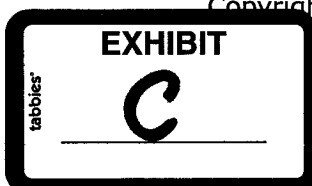
Owner Information for Family Care Pharmacy #5

Showing 3

Owner Name	Owner Title	Owner Address
Pharmed Clinic Corp	Corporation-Cap	4436 W Walnut Garland, TX 75042
<u>Davani, Saeid Faghanian</u> Owner License # 29615	Corp-Vice-Pres	
<u>Khakpour, Hossain</u> Owner License # 29453	Corp-President	

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6